

FILED
U.S. DISTRICT COURT
MASSACHUSETTS OFFICEUNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRAINTREE HOSPITAL LLC)
 d/b/a NORTHEAST SPECIALTY)
 HOSPITAL OF BRAINTREE)
 Plaintiff,)
 vs.)
 VIRGINIA SULLIVAN, JOHN)
 SULLIVAN and PLUMBERS UNION)
 LOCAL 12 WELFARE FUND)
 Defendants)

CIVIL ACTION
No. 04-12136 REK

MAY 11 P 12:18
CLERK'S OFFICE
MASSACHUSETTS DISTRICT COURT
MASSACHUSETTS
6499
5000
May 9, 2005 3/11/05 JH

**DEFENDANT PLUMBERS UNION LOCAL 12 WELFARE FUND'S
MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5.3(b), the undersigned, acting as counsel for Defendant in this matter, now moves for the admission of Gregory S. Campora, Esq. as co-counsel *pro hac vice* in the above-captioned matter. In support of said Motion, the undersigned states as follows:

1. Gregory S. Campora is an associate in my firm of Robert M. Cheverie & Associates, P.C., 333 East River Drive, Suite 101, East Hartford, Connecticut, 06108, telephone number (860) 290-9610. He is a member in good standing of the Bar of the United States District Court in the District of Connecticut and the Bar of the State of Connecticut. See attached Certification of Gregory S. Campora, Esq.

ORAL ARGUMENT IS NOT REQUESTED

2. Robert M. Cheverie & Associates, P.C. specializes in the practice of both labor and employee benefits law. As such, Mr. Campora has developed a longstanding relationship with the Defendant, which would be invaluable during this litigation and at trial. Mr. Campora has never been disciplined by any Court.

3. The undersigned is a member in good standing of the bar of this Court, and will assume responsibility for the conduct of Mr. Campora.

Respectfully submitted,

THE DEFENDANT,
By Its Attorney



Robert M. Cheverie, Esq.
ROBERT M. CHEVERIE &
ASSOCIATES, P.C.
Commerce Center One
333 East River Drive, Suite 101
East Hartford, CT 06108
rcheverie@cheverielaw.com
BBO # 082320